

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA

U.S. DISTRICT COURT  
FILED AT WHEELING, WV

AUG - 6 2013

NORTHERN DISTRICT OF WV  
OFFICE OF THE CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHARLES ADKINS and  
LORETTA MEREDITH,

Defendants.

Criminal No. 1:13CR17

Violations: 18 U.S.C. § 2  
18 U.S.C. § 1512(c)(2)  
18 U.S.C. § 1512(k)  
18 U.S.C. § 1623  
18 U.S.C. § 2250(a)

**FOURTH SUPERSEDING INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

(Failure to Update Sex Offender Registration)

From on or about November 3, 2012, to on or about January 15, 2013, at or near Fairmont, Marion County, West Virginia, within the Northern District of West Virginia and elsewhere, defendant **CHARLES ADKINS**, a person required to register under the Sex Offender Notification Act, and who traveled in interstate commerce, did knowingly fail to update a registration,

IN VIOLATION OF TITLE 18, UNITED STATES CODE SECTION 2250(a).

**COUNT TWO**

(Conspiracy to Attempt to Obstruct Justice)

From on or about January 28, 2013, through on or about May 7, 2013, at or near Flatwoods, Braxton County, West Virginia, and Fairmont, Marion County, West Virginia, within the Northern District of West Virginia and elsewhere, defendants **CHARLES ADKINS** and **LORETTA MEREDITH**, together with other persons known and unknown to the Grand Jury, knowingly conspired to commit offenses against the United States in violation of Title 18, United States Code, Section 1512(c)(2), that is, knowingly and corruptly attempting to obstruct, influence, and impede any official proceeding, as charged in Counts Three, Four, Five, Seven, Eight, Nine, and Ten of this Fourth Superseding Indictment,

IN VIOLATION OF TITLE 18, UNITED STATES CODE SECTION 1512(k).

**COUNT THREE**

(Attempted Obstruction of Justice – Aiding and Abetting)

On or about February 6, 2013, at or near Flatwoods, Braxton County, West Virginia, and Fairmont, Marion County, West Virginia, within the Northern District of West Virginia and elsewhere, defendants **CHARLES ADKINS** and **LORETTA MEREDITH**, aided and abetted by each other, did corruptly attempt to obstruct, influence, and impede any official proceeding, by procuring an affidavit from K.B., a person known to the Grand Jury who is a potential witness in the official proceeding against defendant **CHARLES ADKINS**, said affidavit including false information about the dates that defendant **CHARLES ADKINS** stayed in Fairmont, Marion County, West Virginia between November 3, 2012 and January 15, 2013,

IN VIOLATION OF TITLE 18, UNITED STATES CODE SECTIONS 1512(c)(2) AND 2.

**COUNT FOUR**

(Attempted Obstruction of Justice – Aiding and Abetting)

On or about February 14, 2013, at or near Fairmont, Marion County, West Virginia, within the Northern District of West Virginia and elsewhere, defendants **CHARLES ADKINS** and **LORETTA MEREDITH**, aided and abetted by each other, did corruptly attempt to obstruct, influence, and impede any official proceeding, by preparing an affidavit executed by defendant **LORETTA MEREDITH**, who then was a potential witness in the official proceeding against defendant **CHARLES ADKINS**, said affidavit including false information about

1. whether defendant **CHARLES ADKINS** lived in Fairmont, Marion County, West Virginia between November 2012 and January 2013, and
2. trips defendants **CHARLES ADKINS** and **LORETTA MEREDITH** allegedly took between Fairmont, Jamestown, New York. and Erie, Pennsylvania between November 2012 and January 2013,
3. whether defendant **CHARLES ADKINS** visited with defendant **LORETTA MEREDITH** in her home in New York on several occasions between November 2012 and January 2013,

IN VIOLATION OF TITLE 18, UNITED STATES CODE SECTIONS 1512(c)(2) AND 2.

**COUNT FIVE**

(Attempted Obstruction of Justice – Aiding and Abetting)

On or about February 26, 2013, at or near Flatwoods, Braxton County, West Virginia, within the Northern District of West Virginia and elsewhere, defendants **CHARLES ADKINS** and **LORETTA MEREDITH**, aided and abetted by each other, did corruptly attempt to obstruct, influence, and impede any official proceeding, by procuring an affidavit from W.T., a person known to the Grand Jury who is a potential witness in the official proceeding against defendant **CHARLES ADKINS**, said affidavit including false information about the dates and times that defendant **CHARLES ADKINS** stayed with W.T. in Erie, Pennsylvania between November 3, 2012 and January 15, 2013,

IN VIOLATION OF TITLE 18, UNITED STATES CODE SECTIONS 1512(c)(2) AND

**COUNT SIX**

(False Declarations Before Court)

On or about February 28, 2013, at or near Clarksburg, Harrison County, West Virginia, within the Northern District of West Virginia, defendant **CHARLES ADKINS**, while under oath as a witness in a hearing before the United States District Court for the said District, entitled *United States v. Charles Adkins*, case number 1:13CR17, knowingly did make a false material declaration, that is to say:

1. At the time and place aforesaid, the Court was engaged in a hearing in the aforementioned case wherein defendant **CHARLES ADKINS** was charged with knowing failure to update a sex offender registration. It was a matter material to said hearing to determine whether defendant **CHARLES ADKINS** moved from Erie County, Pennsylvania to Marion County, West Virginia without updating his sex offender registration with Pennsylvania and without registering in West Virginia.

2. At the time and place alleged, defendant **CHARLES ADKINS**, while under oath, did knowingly declare before said Court with respect to the aforesaid material matter, as follows:

Page 8 of transcript:

Q: When you went to New York, did you abandon your residence in Erie?

A: No, sir. I went back to Erie.

The aforesaid underscored testimony of defendant **CHARLES ADKINS**, as he then and there well knew and believed, was false in that defendant **CHARLES ADKINS** moved out of his Erie, Pennsylvania residence and into the Country Club Motor Lodge in Marion County, West Virginia on or about November 3, 2012; and, after he abandoned the Pennsylvania residence, it was rented to J.P., a person known to the Grand Jury from on or about November 13, 2012 and continuing through the date of the return of this Fourth Superseding Indictment.

3. At the time and place alleged, defendant **CHARLES ADKINS**, while under oath, did knowingly declare before said Court with respect to the aforesaid material matter, as follows:

Pages 9-10 of transcript:

Q All right, so that gets us to what, 16<sup>th</sup>, 17<sup>th</sup> [of November]? You tell us?

A I'd say roughly the 16th.

Q Middle of November?

A Yes, sir.

Q Right. You go back to Erie. Where did you go?

A I went back to 952.

Q All right, and how long did you remain there?

A I stayed there about four days. I had been locked out of the house. Gina had – had one set of the keys, and her husband, which is my nephew, had the other set. And apparently he and his mother went back and got the rest of the belongings and locked the house up.

Q Okay.

A So I went upstairs and stayed with the neighbor, a guy that likes to shoot pool and drink beer, and I just went upstairs and hung out with he (sic) for a few days.

\* \* \* \*

Pages 12-13 of transcript:

Q Okay. December rolls around, do you go back to West Virginia?

A Yeah. Yes, I did. I came down to visit.

Q When was that?

A I came down December 5<sup>th</sup>. I believe it was.

\* \* \* \*

Pages 13-14 of transcript:

Q Okay, so how long did you stay. . .there in December?

A It was around the 5<sup>th</sup>. I stayed probably until about the 8<sup>th</sup>, 9<sup>th</sup>, then I went back into Erie....

\* \* \* \*

Q Okay. Well, while you were up in Erie, did you do anything – are you still staying with the neighbor?

A Yes, sir.

Q The same residence? Same building?

A Yes, sir.

Page 15 of transcript:

Q Okay. So where did you go next [in December, after leaving Fairmont]?

A Well, I went back to Erie. And come to find out that the landlady is all upset there....And she's all upset over it, and she won't talk to me. My belongings is in there. I can't get in to get all of my stuff.

Q This is the landlord?

A Yes. So then she tells me she didn't rent it to me, I was just on the lease. So I spent a few days there with the neighbor. His name is [W.T.]....

The aforesaid underscored testimony of defendant **CHARLES ADKINS**, as he then and there well knew and believed, was false in that, between on or about November 3, 2012 and on or about January 15, 2013, defendant **CHARLES ADKINS** stayed with W.T. on only one night, in January 2013,

IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 1623.



**COUNT SEVEN**

(Attempted Obstruction of Justice)

On or about March 5, 2013, at or near Flatwoods, Braxton County, West Virginia, within the Northern District of West Virginia and elsewhere, defendant **CHARLES ADKINS** did corruptly attempt to obstruct, influence, and impede any official proceeding, by mailing a letter to W.T., a person known to the Grand Jury who is a potential witness in the official proceeding against defendant **CHARLES ADKINS**, said letter including false information about the dates and times that defendant **CHARLES ADKINS** stayed with W.T. in Erie, Pennsylvania between October 2012 and January 13, 2013, and said letter requesting that W.T. "stand by [the] words...agreed to in the" February 26, 2013 affidavit referenced in Count Two herein;

IN VIOLATION OF TITLE 18, UNITED STATES CODE SECTION 1512(c)(2).

**COUNT EIGHT**

(Attempted Obstruction of Justice – Aiding and Abetting)

On or about March 14, 2013, at or near Flatwoods, Braxton County, West Virginia, and Fairmont, Marion County, West Virginia, within the Northern District of West Virginia and elsewhere, defendants **CHARLES ADKINS** and **LORETTA MEREDITH**, aided and abetted by each other, did corruptly attempt to obstruct, influence, and impede any official proceeding, by procuring an affidavit from S.E., a person known to the Grand Jury who is a potential witness in the official proceeding against defendant **CHARLES ADKINS**, said affidavit including false information about

1. the motel room for which defendant **CHARLES ADKINS** owed money to Country Club Motor Inn for rental between early November 2012 and mid-January 2013, and
2. whether defendant **LORETTA MEREDITH'S** payment of \$700 to representatives of that motel was intended as a bribe,

IN VIOLATION OF TITLE 18, UNITED STATES CODE SECTIONS 1512(c)(2) AND 2.

**COUNT NINE**

(Attempted Obstruction of Justice)

On or about March 23, 2013, at or near Fairmont, Marion County, West Virginia, within the Northern District of West Virginia and elsewhere, defendant **LORETTA MEREDITH** did corruptly attempt to obstruct, influence, and impede any official proceeding, by preparing a letter forwarded to the United States District Court for the Northern District of West Virginia, said letter enclosing the affidavits of K.B. and S.E. and J.A., and including false information about

1. whether rent was paid to the Country Club Inn for Room 35,
2. whether defendant **CHARLES ADKINS** lived at the Country Club Inn,

IN VIOLATION OF TITLE 18, UNITED STATES CODE SECTION 1512(c)(2).

**COUNT TEN**

(Attempted Obstruction of Justice – Aiding and Abetting)

On or about April 5, 2013, at or near Flatwoods, Braxton County, West Virginia, and Fairmont, Marion County, West Virginia, within the Northern District of West Virginia and elsewhere, defendants **CHARLES ADKINS** and **LORETTA MEREDITH**, aided and abetted by each other, did corruptly attempt to obstruct, influence, and impede any official proceeding, by providing the affidavits of defendant **LORETTA MEREDITH**, S.E, W.T., J.A., and K.B., in support of defendant **CHARLES ADKINS'** Notice of Alibi and Reciprocal Discovery, which defendant **CHARLES ADKINS** caused to be filed with the Court on that date,

IN VIOLATION OF TITLE 18, UNITED STATES CODE SECTIONS 1512(c)(2) AND 2.

FORFEITURE ALLEGATION

*Obstruction*

Pursuant to Title 28, United States Code, Section 2461(c), Title 18, United States Code, Sections 981(a)(1)(C), 1956(c)(7), 1961(1), and Title 21, United States Code, Section 853, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1512, or a conspiracy to violate such offense.

A True Bill,

/s/  
Grand Jury Foreperson  
(Signature on File)

/s/  
WILLIAM J. IHLENFELD, II  
United States Attorney